

DEPOSITION OF DAVID HARRIS

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF UTAH, CENTRAL DIVISION  
3                                   -ooOoo-  
4       JOSHUA CHATWIN,                                   : CIVIL NO. 2:14-cv-375  
5                   Plaintiff,                               : DEPOSITION OF:  
6       v.   : DAVID HARRIS  
7   : TAKEN: December 9, 2015  
8       DRAPER CITY; Draper City                         : Judge Dale A. Kimball  
9       Police Department;                                 :  
10      OFFICER J. PATTERSON, in                         :  
11      his individual and                                 :  
12      official capacity;                                 :  
13      OFFICER HEATHER BAUGH,                           :  
14      in her individual and                             :  
15      official capacity;                                 :  
16      OFFICER DAVID HARRIS, in                         :  
17      his individual and                                 :  
18      official capacity;                                 :  
19      OFFICER KURT IMIG, in                             :  
20      his individual capacity;                           :  
21      SUPERVISOR TBA; and JOHN                         :  
22      DOES 1-10   :  
23                   Defendants.

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18                                   -ooOoo-  
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20                   Deposition of DAVID HARRIS, taken on behalf  
21      of the plaintiff, at 201 South Main Street, Suite  
22      1300, Salt Lake City, Utah, before PHOEBE S.  
23      MOORHEAD, Certified Shorthand Reporter for the State  
24      of Utah, pursuant to Notice.

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1 time frame are we talking about?

2 BY MS. MARCY:

3 Q. From the time Mr. Chatwin -- if you have to  
4 tell me the continuum of time -- from the time you see  
5 Mr. Chatwin's head at the bottom of the driveway until  
6 the paramedics arrived, where were you in that continuum  
7 of time in relation to Mr. Chatwin?

8 A. I was either next to him, touching him, or  
9 within feet of him.

10 Q. And when you say, "touching him," what were  
11 you doing when you were touching him?

12 A. Moving him from the gutter to leaning against  
13 my vehicle.

14 Q. Aside from moving him, did you touch him any  
15 other time, until the paramedics arrived?

16 A. I don't believe so.

17 Q. If you look at the next pictures that you  
18 took, we would call those "M" and "N," "M" being the top  
19 where the knees show the markings.

20 A. Yes.

21 Q. When you took that photograph, did you notice  
22 whether those -- those injuries were new or old? Could  
23 you determine that?

24 A. I -- I don't remember, but I think I took them  
25 because they were new. They looked new.